

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

May 19, 2020

BY ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED, pg. 2

Re: *United States v. Doran Santiago Ramos, 20 Cr. 4 (ER)*

Dear Judge Ramos:

The parties write in response to the Court's May 15 Order, directing the parties to submit a joint status report. ECF No. 24. The parties are in the process of negotiation of a possible pretrial disposition, as well as discovery review and investigation, and jointly request a subsequent pretrial conference in three months (August 2020).

Additionally, Mr. Santiago Ramos requests that the Court modify his conditions of release to place him on home detention instead of home incarceration. Mr. Santiago Ramos has been compliant with the strict requirements of home incarceration since his release on March 19, 2020. Mr. Santiago Ramos's pretrial officer, John Moscato, reports that Mr. Santiago Ramos checks in as directed and has not had any issues while on home incarceration. Placing Mr. Santiago Ramos on home detention would permit Mr. Santiago Ramos to do his own grocery shopping and, when safe to do so, work and attend church with the permission of pretrial. The government does not oppose this proposed modification of Mr. Santiago Ramos's conditions of release.

Finally, in an abundance of caution, the Government respectfully requests that the Court exclude time under the Speedy Trial Act, from today, May 19, 2020 to the date that the conference is rescheduled to permit the parties to continue negotiations regarding possible pretrial disposition. The Government submits that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A). The defendant consents to the exclusion of time.

Respectfully submitted,

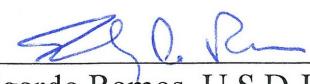
MEMO ENDORSED

/s/ Zawadi Baharanyi
Zawadi Baharanyi, Esq.
Assistant Federal Defender
Tel: (212) 417-8735/ (917) 612-2753
Email: Zawadi_Baharanyi@fd.org

CC: AUSA Brett Kalikow

A pretrial conference will be held on August 14, 2020, at 10:30 AM. Mr. Santiago Ramos' bond conditions are modified from home incarceration to home detention as directed by Pretrial Services. Speedy trial time is excluded from May 19, 2020, until August 14, 2020, in the interest of justice.

SO ORDERED.



Edgardo Ramos, U.S.D.J
Dated: 5/22/2020
New York, New York

5/22/2020